

District Judge Jamal N. Whitehead

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JANE MADI1, *et al.*,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, *et al.*,

Defendants.

Case No. 2:24-cv-01470-JNW

STIPULATED MOTION TO HOLD  
CASE IN ABEYANCE AND ORDER

Noted for Consideration:  
November 7, 2024

Plaintiffs and Defendants, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to stay these proceedings until May 15, 2025. Plaintiffs brought this litigation pursuant to the Administrative Procedure Act and Mandamus Act seeking, *inter alia*, to compel the U.S. Citizenship and Immigration Services (“USCIS”) adjudicate their Forms I-589, Applications for Asylum and for Withholding of Removal. Defendants’ response to the Complaint is currently due on November 25, 2024. The parties are currently working towards a resolution to this litigation. For good cause, the parties request that the Court hold the case in abeyance until May 15, 2025.

1 Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706  
2 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to  
3 control the disposition of the causes on its docket with economy of time and effort for itself, for  
4 counsel, and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ.  
5 P. 1.

6 With additional time, this case may be resolved without the need of further judicial  
7 intervention. USCIS has scheduled Plaintiffs’ asylum interview for January 15, 2025. USCIS  
8 agrees to diligently work towards completing the adjudications within 120 days of the interviews,  
9 absent unforeseen or exceptional circumstances that would require additional time for  
10 adjudications. If the adjudications are not completed within that time, USCIS will provide a status  
11 report to the Court. Plaintiffs will submit all supplemental documents and evidence, if any, to  
12 USCIS seven to ten days prior to the interview date. Plaintiffs recognize that failure to submit  
13 documents prior to the interview may require the interview to be rescheduled and the adjudication  
14 delayed. If needed, Plaintiffs will bring an interpreter to the interview, otherwise the interview  
15 will need to be rescheduled and the adjudication delayed. After the interview, USCIS will need  
16 time to adjudicate Plaintiffs’ asylum application. Once the application is adjudicated, Plaintiffs  
17 will dismiss the case with each party to bear their own litigation costs and attorneys’ fees.  
18 Accordingly, the parties request this abeyance to allow USCIS to conduct Plaintiffs’ asylum  
19 interview and then process their asylum applications.

20 As additional time is necessary for this to occur, the parties request that the Court hold the  
21 case in abeyance until May 15, 2025. The parties will submit a joint status report on or before  
22 May 15, 2025.

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1 DATED this 7th day of November, 2024.

2 Respectfully submitted,

3 TESSA M. GORMAN  
United States Attorney

LAW OFFICES OF BART KLEIN

4 s/ Michelle R. Lambert

5 MICHELLE R. LAMBERT, NYS #4666657  
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*Attorney for Plaintiffs*

10 *Attorneys for Defendants*

11 *I certify that this memorandum contains 412*  
12 *words, in compliance with the Local Civil Rules.*

**ORDER**

The case is held in abeyance until May 15, 2025. The parties shall submit a joint status report on or before May 15, 2025. It is so **ORDERED**.

DATED this 8th day of November, 2024.

A handwritten signature in black ink, appearing to read "Jamal W.", is written over a solid black horizontal line.

Jamal N. Whitehead  
United States District Judge